

Atlantic Richfield Company

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November 6, 2009

CERTIFIED – RETURN RECEIPT REQUESTED

Ms. Nadia Hollan Burke
Remedial Project Manager
U.S. Environmental Protection Agency Region 9
75 Hawthorne Street, SFD-8-2
San Francisco, CA 94105

**Subject: October 2009 Monthly Report, Yerington Mine Site, Lyon County, Nevada:
Administrative Order for Remedial Investigation and Feasibility Study, EPA Docket
No. 9-2007-0005; Administrative Order on Consent, EPA Docket No. 09-2009-0010**

Dear Ms. Hollan Burke:

Pursuant to the above referenced orders issued by the U.S. Environmental Protection Agency – Region 9 (EPA), please note the following monthly status report for Atlantic Richfield Company (ARC) RI/FS and removal action activities at the Yerington Mine Site (Site) during October 2009.

October 2009 Activities

Operations, Maintenance and Site Security

- Continued routine Site O&M, security and bird deterrent activities including operation of the propane cannons for the Arimetco ponds with the exception of the VLT Pond, as directed by EPA. The bird guard towers were reactivated October 5 in anticipation of potential ponding water due to precipitation, and were operated during the remainder of the month.
- PWS evaporation pond levels: North Cell <1.00 feet (minimum staff gauge level recorded April 16, 2009); Middle Cell = 0 feet; South Cell < 0.1 feet. Uncorrected pan evaporation for the month of October was 3.84 inches; the Site received 1.46 inches of precipitation.
- An inspection was performed on the evaporation pond cell liners on October 19 by Brown and Caldwell and Sierra Geosynthetics; the inspection report was transmitted to EPA on October 26.
- Arimetco heap leach fluid management system (FMS): 1) total estimated gallons transferred from VLTSP Pond to Evaporation Pond = 60,000 gallons; slot sediment pond (SSP) to Evaporation Pond = 54,000 gallons. Phase 1 Pond to Evaporation Pond = 0 gallons; 2) Pond levels: Phase 1 Pond = <1.0 foot; Evaporation Pond = 5.5 feet; VLT Pond = 5.0 feet; Slot 2 Pond = 14.5 feet.
- The Conex storage facility adjacent to the Laboratory was burglarized on October 27, and a police report was filed with the Sheriff's office.
- Fire extinguishers on the Site were subject to the annual check and recharged, and the carbon dioxide extinguishers used for electrical fires were taken off-Site for hydrostatic testing and refilling (6-year testing and refilling program).

A BP affiliated company



October 2009 Activities - Continued

Other Site Activities

- Quatterra moved core samples into the warehouse on October 9.
- Tom Dunkelman (EPA) and Lisa Monroe (LM&A) sampled the administration building for asbestos on October 13. EPA also inspected the bioremediation project the same day.
- Potential electrical contractors conducted site visits on October 13 and 16 ahead of preparing bids for the implementation of the electrical hazards removal action.
- Jim Harvey (USFWS) and Wayne Bull (GBI) initiated the daily bird monitoring program of Site Ponds on October 22. The program will continue to be supported by GBI.
- Tom Dunkelman (EPA) and three contractors (EQM, Diversified and Marcor) visited the administration building.

Site Characterization

- Site-wide monthly groundwater elevation measurements were obtained on October 28-30.
- A pit lake water elevation of 4218.88 feet amsl was recorded on October 27 from the pressure transducer, an increase of 0.30 feet over a 30-day period (since September 27). The pit lake elevation has risen 2.92 feet since October 27, 2008.
- Continued meteorological monitoring at the AM-6 location including wind speed/direction, temperature, relative humidity, barometric pressure, precipitation and solar radiation.
- Ongoing project database management.
- Initiated responses to comments on the Conceptual Site Model prepared by the Yerington Paiute Indian Tribe. Completed the first two steps in developing list of plants potentially used by the Yerington and Walker River Paiute Tribes for tribal lifeways practices, to be included in the next CSM revision, and submitted the plant list in a letter to EPA dated October 15.
- Compilation of groundwater monitoring data for inclusion in the 3Q 2009 Groundwater Monitoring Report. Conducted statistical analyses of trends in chemical concentrations in domestic and monitor wells. Preparation for the 4Q 2009 groundwater monitoring event.
- Continued the evaluation of groundwater data generated from the PWS Characterization Work Plan. Continued evaluation of Site-wide geochemical and tracer data, including chlorine-36 data.
- Initiated the preparation of a revised version of the 2007 Site-Wide Groundwater Monitoring Plan to incorporate current standard operating procedures (SOPs). Initiated the development of domestic well sampling SOPs.
- Continued preparation of the Process Areas Vadose Zone Characterization Work Plan, which will serve as the next phase of the remedial investigation for OU-3.
- Continued Site wildlife surveys, maintenance of wildlife observation database and preparation of weekly wildlife observation report. Reviewed US Fish and Wildlife Service health and safety plan for USFWS wildlife monitoring.

AOC Removal Actions

- Continued engineering design work for the removal actions associated with the inactive Anaconda Evaporation Ponds, included recent geotechnical data from Black Eagle Consulting for the basis of design, and initiated preparation of the Draft Removal Action Implementation Work Plan.
- Submitted the revised Anaconda Evaporation Ponds Removal Action Characterization Data Summary Report (RAC DSR) to EPA on October 15.

October 2009 Activities - Continued

- Conducted site walks, and requested and received bids from qualified electrical contractors for work associated with the Potential Electrical Hazards Removal Action Work Plan. Provided the \$5,000 service fee (meter installation) to NV Energy for their participation in the removal action.
- Compiled field and available laboratory data for the field inspection, radiometric survey and sampling of pipe materials (non-validated radiochemical data was received by October 27). Initiated the preparation of the Draft Removal Action Plan document.
- Initiated responses to comments on the Draft XRF Work Plan.

Site Issues

- Non-Routine pumping continues from the Slot Pond leak detection sump at a rate of approximately 1.2 gallons per minute (no surface expression of leak is evident).
- The visual inspection PWS evaporation pond liner cells determined the east berm of the South Cell would require repairs for that cell to be returned to service, the Middle Cell can be returned to service with no repairs, and the North Cell is under evaluation.

Planned November/December 2009 Activities

- Continue routine O&M, site security, and bird deterrent activities. As requested, support USFWS inspection activities during work week business hours.
- Install and evaluate flow meters on a trial basis to assess their performance for the Arimetco FMS, and initiate a preliminary water balance calculation for the Arimetco FMS.
- Initiate the PWS well rehabilitation program.
- Submit work plan and initiate repair of East Berm of South Cell PWS evaporation pond
- Perform the 4Q 2009 groundwater monitoring event in November, which will include the sampling of domestic wells from residences along Locust Drive and Luzier Lane. Submit the 3Q 2009 domestic well analytical results to EPA for distribution to well owners/residents.
- Continue groundwater elevation and pit lake level monitoring. Continue meteorological monitoring at AM-6.
- Submit the Draft Implementation Work Plan for the removal action for the inactive Anaconda Evaporation Ponds and Sub-Area A.
- Respond to EPA comments on the Draft XRF Work Plan.
- Submit the Draft Transite Pipe Removal Action Plan, including transite pipe inspection and characterization activities (radiometric survey, laboratory asbestos and radiochemical analyses).
- Provide EPA with a landfill design for the placement of tires and administration building debris, as part of a removal action to be conducted by EPA.
- Award the bid for, and begin work on, implementing the electrical hazards work plan.
- As received, respond to EPA comments to the draft versions, and prepare final versions of the following AOC/SOW deliverables: 1) Site O&M Plan; and 2) Draft Process Areas Radiological Characterization Work Plan – Revision 1.
- Submit the Process Areas Vadose Zone and Groundwater Characterization Work Plan to EPA.
- Continue to compile data for the 3Q 2009 Groundwater Monitoring Report.
- As received, respond to EPA comments on the Shallow Zone Characterization DSR and the Draft PWS Characterization Work Plan Addendum. Pending EPA approval, conduct PWS well rehabilitation and aquifer testing.
- Attend a technical groundwater meeting with EPA and other stakeholders on December 9-10.
- Continue Site wildlife surveys, maintenance of wildlife observation database and preparation of wildlife observation reports.

If you have any questions or comments, please feel free to contact me at (714) 228-6774 or via e-mail at jack.oman@bp.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Oman" with a stylized flourish at the end.

Jack Oman
Project Manager

cc: Dave Seter, EPA – via electronic mail
Mike Montgomery, EPA – via electronic mail
Roberta Blank, EPA – via electronic mail
Andrew Helmlinger, EPA – via electronic mail
Tom Dunkelman, EPA – via electronic mail
Joe Sawyer, NDEP – via electronic mail
Tom Olsen, BLM – via electronic mail
Dan Newell, City of Yerlington – via electronic mail
Phyllis Hunewill, Lyon County Commissioner – via electronic mail
Dennis Stark, Lyon County Manager – via electronic mail
Richard Faber, Lyon County Facilities Engineering – via electronic mail
Justin Whitesides, YPT – via electronic mail
Chairman Emm, YPT – via electronic mail
Dietrick McGinnis, McGinnis and Associates – via electronic mail
Chairman Reymus, WRPT – via electronic mail
Roxanne Ellingson, WRPT – via electronic mail
Ron Halsey, Atlantic Richfield Company - via electronic mail
James Lucari, Atlantic Richfield Company – via electronic mail
Roy Thun, Atlantic Richfield Company – via electronic mail
Don Pratt, Atlantic Richfield Company – via electronic mail
John Batchelder, EnviroSolve – via electronic mail
Jim Chatham, Atlantic Richfield Company – via electronic mail
Rich Curley, Curley and Associates, LLC – via electronic mail
Peggy Pauley, YCAG – via electronic mail
Lyon County Library System Central